

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

ALEJANDRA CASTANEDA,

Plaintiff,

v.

STATE OF TEXAS – TEXAS TECH
UNIVERSITY HEALTH SCIENCES
CENTER AT EL PASO,

Defendant.

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CIVIL ACTION NO. 3:24-cv-00189-LS

DEFENDANT’S EXPERT WITNESS DESIGNATION

TO: Plaintiff, Alejandra Castaneda, by and through her attorneys of record, Enrique Chavez, Jr., Michael R. Anderson, and Michael M. Osterberg, Chavez Law Firm, 2101 N. Stanton Street, El Paso, Texas 79902.

Defendant, Texas Tech University Health Science Center – El Paso (“TTUHSCEP”), hereby serves its Expert Witness Designation and, in support thereof, respectfully shows the Court the following:

PRE-TRIAL DISCLOSURE OF IDENTITY OF EXPERTS

Pursuant to Federal Rules of Evidence 702, 703, and 705, the following individual may be called to testify at trial as an expert witness:

Stephanie A. Criscione

Assistant Attorney General

Office of the Texas Attorney General

P.O. Box 12548

Austin, Texas 78711-2548

(512) 936-1675

Ms. Criscione is an attorney in good standing in the State of Texas and is licensed to practice in all state and federal courts in the state of Texas. She has a Bachelor of Arts from Fordham University and a juris doctorate from Wake Forest University. She has been licensed to practice since 2018.

Ms. Criscione is expected to testify based on her education, experience, and training as an attorney in Texas. Her testimony may include opinions regarding the reasonableness, necessity, and customary nature of attorney's fees in this matter. Furthermore, Ms. Criscione will testify in rebuttal as to Plaintiff's reasonable and necessary attorney's fees. Additionally, Defendant cross-designates any and all fact or expert witnesses designated by Plaintiff.

Respectfully submitted.

KEN PAXTON

Attorney General of Texas

BRENT WEBSTER

First Assistant Attorney General

RALPH MOLINA

Deputy First Assistant Attorney General

AUSTIN KINGHORN

Deputy Attorney General for Civil Litigation

KIMBERLY GDULA

Chief for General Litigation Division

/s/ Stephanie A. Criscione /s/

STEPHANIE A. CRISCIONE

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CERTIFICATE OF SERVICE

I certify that that on May 5, 2025, this document was served via electronic mail, delivery receipt and read receipt requested, causing electronic service upon all counsel of record.

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ATTORNEYS FOR PLAINTIFF

/s/ Stephanie A. Criscione /s/

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